

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

RYAN, LLC

Plaintiff,

v.

FEDERAL TRADE COMMISSION,

Defendant.

NO. 3:24-CV-00986-E

**UNOPPOSED MOTION OF THE PARTNERSHIP FOR NEW YORK
CITY FOR LEAVE TO PROCEED WITHOUT LOCAL COUNSEL**

Pursuant to Local Rule 83.10, amicus curiae the Partnership for New York City (amicus), respectfully seeks leave to proceed without local counsel.

1. Amicus is a nonprofit membership organization representing New York City’s business leadership and its largest private sector employers. Its members, the economy of New York City, and New York State would be adversely impacted if the Federal Trade Commission’s Non-Compete Clause Rule, 16 C.F.R. Part 910 and 912 (May 7, 2024) (the “Rule”) were to go into effect. Therefore, amicus intends to seek this Court’s leave to file an amicus brief in support of Plaintiff and Plaintiffs-Intervenors’ challenges to the Rule.

2. Amicus respectfully requests that the Court permit amicus to proceed without local counsel. Amicus intends only to file a motion for leave to file an amicus brief, and the motion will be unopposed.

Accordingly, amicus expects that the Court will decide the motion on the papers and without a hearing. In light of amicus' limited participation in this case, amicus respectfully requests that the local counsel requirement be waived.

3. Amicus' counsel have reviewed the Local Rules for the Northern District of Texas and this Court's procedures.

4. Counsel for Plaintiff and Plaintiffs-Intervenors consent to this motion. Counsel for the FTC take no position on this motion.

CONCLUSION

The Court should grant amicus leave to proceed without local counsel.

Respectfully submitted.

/s/ Arthur J. Burke

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Counsel for Amicus Curiae

Dated: May 24, 2024

CERTIFICATE OF CONFERENCE

I hereby certify that on May 15, 2024, my office conferred with counsel for Plaintiff, counsel for Plaintiffs-Intervenors, and counsel for the FTC for their position on this motion. Counsel for Plaintiff and for Plaintiffs-Intervenors consent to the relief requested in the motion. Counsel for the FTC take no position on this motion.

/s/ Christopher Lynch

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CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2024, I electronically filed this document using the ECF System, which will send notification to the ECF counsel of record.

/s/ Christopher Lynch

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